IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Rodger Joseph Gingco

Debtor

CHAPTER 13

Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust

<u>Movant</u>

NO. 14-02837 MDF

VS.

Rodger Joseph Gingco

Debtor

Nature of Proceeding: Motion for Relief

Charles J. DeHart, III Esq.

<u>Trustee</u>

REQUEST TO CONTINUE HEARING WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; both parties are attempting settlement.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: November 11, 2016 /s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire Attorney for Movant BNY Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532 (215) 627-1322 Fax (215) 825-6406